

5. Kimberly Guthrie is a senior associate in my office, with experience in general civil litigation, including employment disputes. She received her Bachelor of Arts in Political Science from the University of Missouri-Columbia in 2012. She received her Juris Doctorate Degree from the University of Missouri-Columbia, graduating with honors, in 2015.

6. Newman, Comley and Ruth, P.C. is a long-standing civil litigation firm in mid-Missouri that has been in existence since 1993. The firm represents clients in all manner of employment actions, including matters involving the Fair Labor Standards Act and federal and state anti-discrimination laws. The firm also has experience handling civil rights claims, specifically those made against municipal actors.

7. By way of example, I have represented clients in the following employment and civil rights related matters:

Fuchs v. Department of Revenue, Circuit Court of Cole County, Missouri Case Number 11AC-CC00486-01 (represented the Plaintiff alleging workplace discrimination in violation of the Missouri Human Rights Act); *Turk v. Radiowire.net, Inc., et al.*, Circuit Court of Cole County, Missouri Case Number 18AC-CC00353 (represented the Defendants against allegations of improper pay and wrongful discharge in a potential class action); *Struttman v. Korte, et al.*, United States District Court for the Eastern District of Missouri, Case Number 2:19-CV-0072-PLC (representing the Defendants in a claimed civil rights violation related to the death of an inmate).

8. Newman, Comley and Ruth, P.C., with the assistance of Cook, Vetter, Doerhoff & Landwehr has the resources to represent the putative collective class in this case and is committed to doing so if the Court appoints it as class co-counsel.

9. Newman, Comley and Ruth, P.C. began its representation of a client in this matter in October of 2018.

10. Both Kim Guthrie and I worked on this matter (as well as very minimal work from another associate, John T. Brooks). I have practiced law approximately ten (10) years, and Kim Guthrie has practice law for approximately five (5) years. My normal hourly rate for all matters in our office is \$300 per hour and Ms. Guthrie's is \$240.

11. We used legal assistants and paralegals for work on this matter where appropriate but are not submitting any time or asking to be reimbursed for their work.

12. Newman, Comley and Ruth, P.C. has incurred out of pocket expenses in the amount of \$ 1,935.61.


13. Newman, Comley and Ruth, P.C. kept time records for the time expended by attorneys in connection with the investigation and litigation of this matter. True and accurate copies of those time records are attached to this Declaration. As shown on the time records, the following time was expended:

Ryan J. McDaniels	202 hours @ \$300/hour=	\$60,600
Kim Guthrie	148.2 hours @ \$240/hour=	\$35,568
John T. Brooks	3.2 hours @ \$215/hour=	\$688
	Total:	\$96,856

14. Newman, Comley and Ruth, P.C.'s representation of the Plaintiffs in this matter was under a contingency fee agreement.

I declare that to the best of my knowledge that the foregoing is true and correct.

Executed this 1st day of May, 2020 in Jefferson City, Missouri.



Ryan J. McDaniels

Date	Attorney	Description	Hours
10/12/2018	RJM	Preparation for conference with Kari Schulte and Matt Clement; email correspondence with Kila Hagler in preparation for conference; conference with Kari Schulte and Matt Clement	2.5
10/15/2018	RJM	Email correspondence to Kila Hagler regarding wage and hour claims; review of responsive email	0.1
10/16/2018	RJM	Email correspondence to Matt Clement and Kari Schulte	0.2
10/19/2018	RJM	Telecon with Lori Hopkins regarding wage and hour claim	0.2
10/22/2018	RJM	Telecons with Kila Hagler and Lori Hopkins regarding initial client meetings; email correspondence with Matt Clement and Kari Schulte regarding initial client meetings	0.6
10/31/2018	RJM	Office conference with Lori Hopkins; telecon with Kila Hagler; confer with Matt Clement and Kari Schulte; preparation of email correspondence to Lori Hopkins and Kila Hagler regarding potential claims	2
12/31/2018	RJM	Email correspondence with Matt Clement and Kari Schulte regarding case status	0.1
1/9/2019	RJM	Email correspondence with Lori Hopkins regarding case status	0.1
1/14/2019	RJM	Confer with Matt Clement regarding case status and preparation of filings	0.6
1/15/2019	RJM	Review of fee agreements; email correspondence with Kila Hagler and Lori Hopkins regarding fee agreements	0.5
1/22/2019	RJM	Review and analyze research memorandum from Kim Guthrie related to FLSA issues, on call time and state law claims	0.5
1/23/2019	RJM	Conference with Kim Guthrie regarding research on FLSA issues in preparation for filing complaint; email correspondence to all Plaintiffs' counsel regarding same	0.5
2/11/2019	RJM	Email correspondence with all Plaintiffs' counsel regarding corporate structure of AeroCare	0.2
2/13/2019	RJM	Email correspondence with Matt Clement regarding draft Complaint	0.2
2/14/2019	RJM	Review draft Complaint and research regarding issues of joinder, removal, and venue; review notes regarding client conferences in preparation for telephone conference on 2/15/2019	1.4

2/15/2019	RJM	Preparation for telecon with all Plaintiffs' counsel regarding draft Complaint and issues regarding same including named Plaintiff, venue, and confirmation of facts; telecon with all Plaintiffs' counsel regarding same	0.7
2/19/2019	RJM	Email correspondence to Kila Hagler and Lori Hopkins regarding additional information needed for Complaint; telecon with Kila Hagler regarding Complaint	0.4
3/11/2019	RJM	Brief review and additional revision to Complaint in preparation for sending to all Plaintiffs' counsel	0.2
3/12/2019	RJM	Attention to Matt Clement and Kari Schulte's revisions to Complaint; email correspondence with all Plaintiffs' counsel regarding same	0.7
3/13/2019	RJM	Telecon with all Plaintiffs' counsel regarding Complaint; review of revised Complaint; email correspondence with all Plaintiffs' counsel regarding revised Complaint	0.6
3/14/2019	RJM	Email correspondence to Kila Hagler and Lori Hopkins regarding Complaint and consents	0.3
3/15/2019	RJM	Email correspondence with Kila Hagler and Lori Hopkins; email correspondence with all Plaintiffs' counsel regarding filing of Complaint and entries of appearance	0.3
3/19/2019	RJM	Prepare entries of appearance and attention to filing same	0.2
4/18/2019	RJM	Detailed review of Motion to Dismiss filed by Defendants and case law in support in preparation for telecon with all Plaintiffs' counsel regarding suggestions in opposition to Defendants' Motion to Dismiss; telecon with all Plaintiffs' counsel regarding suggestions in opposition to Defendants' Motion to Dismiss	0.9
4/22/2019	RJM	Email correspondence with all Plaintiffs' counsel and Defendants' counsel regarding Rule 26 conference; review of Court's Order regarding EAP program; review of Court's General Order regarding same; review mediator list; attention to mediator choice	1.3
4/23/2019	RJM	Email correspondence with all Plaintiffs' counsel regarding Rule 26 disclosures and conference; attention to suggestions in opposition of Defendants' Motion to Dismiss	0.4

4/24/2019	RJM	Rule 26(f) telephone conference with all Plaintiffs' counsel and Defendants' counsel; review and revise suggestions in opposition to Defendants' Motion to Dismiss	1.2
4/26/2019	RJM	Email correspondence with all Plaintiffs' counsel and Defendants' counsel regarding mediation	0.3
4/29/2019	RJM	Attention to suggestions in opposition to Defendants' Motion to Dismiss; email correspondence with all Plaintiffs' counsel and Defendants' counsel regarding scheduling mediation	1
4/30/2019	RJM	Attention to suggestions in opposition to Defendants' Motion to Dismiss and Rule 26 disclosures	0.4
5/2/2019	RJM	Correspondence in preparation for tomorrow's hearing and mediation scheduling	1.2
5/3/2019	RJM	Preparation for hearing with Court; telephone hearing with Court regarding scheduling order	0.4
5/6/2019	RJM	Attention to discovery requests and Rule 26 disclosures	2.5
5/7/2019	RJM	Prepare discovery requests to AeroCare entities	3
5/8/2019	RJM	Attention to mediation deadline and emails; telecon with Defendants' counsel regarding mediation and Rule 26 disclosures; correspondence with mediator's office regarding mediation	0.5
5/9/2019	RJM	Attention to documents for production and designation as part of Rule 26 disclosures	1.3
5/10/2019	RJM	Attention to final draft of Rule 26 disclosures and documents	0.4
5/13/2019	RJM	Prepare discovery requests to Defendants; email correspondence with all Plaintiffs' counsel regarding same; review and analysis of Defendants' Rule 26 disclosures; email correspondence with all Plaintiffs' counsel regarding Defendants' Rule 26 disclosures	2
5/14/2019	RJM	Review of Defendants' Reply Suggestions in Support of Motion to Dismiss; email correspondence with all Plaintiffs' counsel regarding same	0.4
6/4/2019	RJM	Email correspondence with Defendants' counsel regarding outstanding discovery requests	0.1
6/14/2019	RJM	Attention to pending discovery and preparation of mediation statement	0.4

6/17/2019	RJM	Attention to litigation strategy, preparation of mediation statement and Court Order related to Motion to Dismiss; prepare for telecon with all Plaintiffs' counsel; telecon with all Plaintiffs' counsel regarding discovery and mediation statement; revise mediation statement	2.1
6/18/2019	RJM	Email correspondence with Lori Hopkins regarding mediation; prepare discovery requests	0.7
6/20/2019	RJM	Email correspondence with Kila Hagler regarding case status; telecon with Lori Hopkins regarding mediation	0.5
6/21/2019	RJM	Attention to Lori Hopkins' discovery responses	0.3
6/24/2019	RJM	Email correspondence with mediator regarding mediation	0.3
6/25/2019	RJM	Review of Rule 26 disclosures and mediation statement in preparation for mediation; attend mediation	6.4
7/5/2019	RJM	Review of Lori Hopkins' draft discovery responses	0.2
7/9/2019	RJM	Review of discovery requests to Defendants to determine if additional discovery is required in light of mediation information; email correspondence to all Plaintiffs' counsel regarding same	0.4
7/16/2019	RJM	Attention to golden rule letter from Defendants' counsel; correspondence with all Plaintiffs' counsel regarding same and response to letter and extension of time for discovery	0.3
7/21/2019	RJM	Legal research regarding numerosity requirements for class actions	1
8/6/2019	RJM	Preparation of post-mediation statement	0.5
8/19/2019	RJM	Attention to order approving motion to amend; email correspondence with all Plaintiffs' counsel regarding filing amended Complaint	0.3
8/28/2019	RJM	Review and revise proposed protective order; email correspondence with all Plaintiffs' counsel regarding protective order	0.5
9/2/2019	RJM	Email correspondence with all Plaintiffs' counsel regarding discovery schedule	0.2
9/7/2019	RJM	Review voluminous discovery responses from Defendants	2.5
9/8/2019	RJM	Review voluminous discovery responses from Defendants; email correspondence with all Plaintiffs' counsel regarding possible deponents	3
9/9/2019	RJM	Conference with Kim Guthrie regarding discovery review and Rule 26 supplementation; email correspondence with all Plaintiffs' counsel regarding needed depositions	0.7
9/18/2019	RJM	Review voluminous discovery responses from Defendants	1

9/19/2019	RJM	Review voluminous discovery responses from Defendants; prepare memorandum regarding same	3
10/17/2019	RJM	Telecon with Matt Clement regarding discovery issues; email correspondence with Defendants' counsel regarding discovery issues and Defendants' policies and procedures; prepare topics for corporate representative deposition	1.5
10/21/2019	RJM	Prepare topics for Defendants' corporate representative deposition	1
11/1/2019	RJM	Attention to discovery and Rule 26 disclosures; telecon with all Plaintiffs' counsel regarding depositions and Rule 26 disclosures	0.5
11/8/2019	RJM	Email correspondence with Matt Clement regarding scheduling of Everette Webb's deposition; telecon to schedule place to hold deposition of Everette Webb	0.3
11/12/2019	RJM	Attention to Kila Hagler's Rule 26 disclosures and supplemental discovery responses for Lori Hopkins	0.3
11/13/2019	RJM	Conference with Kim Guthrie regarding strategy for Defendants' corporate representative depositions; prepare for deposition of Everette Webb; attention to deposition rules regarding corporate representative deposition and limitation on time for deposition; attention to serving subpoena on Everette Webb; email correspondence with all Plaintiffs' counsel regarding corporate representative depositions throughout day; research regarding multiple notices of corporate representative depositions	2.5
11/18/2019	RJM	Review of additional discovery responses and documents produced by Defendants; research regarding joint employer theory under the FLSA; research regarding applicability of subsequent remedial measures doctrine in FLSA case; email correspondence with all Plaintiffs' counsel regarding discovery documents recently produced by Defendants	4
11/19/2019	RJM	Telecon with all Plaintiffs' counsel regarding litigation strategy, discovery, and depositions; attention to subpoena to Everette Webb; attention to letter sent from Defendants' counsel regarding objections to corporate representative deposition notice; email correspondence with all Plaintiffs' counsel regarding Defendants' objections to corporate representative deposition notice	1.3

11/20/2019	RJM	Prepare and revise response to Defendants' objections to corporate representative deposition notice; telecon with all Plaintiffs' counsel regarding discovery; preparation of one-page summary of discovery dispute to the Court; telecon with Defendants' counsel regarding scheduling Everett Webb's deposition	2.3
11/21/2019	RJM	Attention to discovery disputes; review and revise one-page summary regarding discovery dispute; review additional payroll records sent from Defendants	1
11/22/2019	RJM	Email correspondence with all Plaintiffs' counsel and Defendants' counsel regarding Everett Webb's deposition; research in preparation for hearing regarding discovery dispute; telephone hearing regarding discovery dispute; telecon with all Plaintiffs' counsel regarding recent discovery requests sent from Defendants; review of Defendants' January 2016 employment handbook	3.2
11/25/2019	RJM	Detailed review of Defendants' discovery responses to prepare for corporate representative and Everett Webb depositions	5.5
11/26/2019	RJM	Travel to and from Kansas City; attend depositions of Defendants' corporate representative	13
11/27/2019	RJM	Conference with Kim Guthrie regarding corporate representative deposition, strategy, and litigation steps; review documents produced by Defendants during deposition; attention to strategy in relation to corporate representative's inability to discuss specific topics	2
12/9/2019	RJM	Prepare for deposition of Everett Webb	1.3
12/10/2019	RJM	Prepare for deposition of Everett Webb; conference with Kim Guthrie regarding same; telecon with Matt Clement regarding deposition of Everett Webb	6.2
12/11/2019	RJM	Prepare for deposition of Everett Webb; travel to and from Lebanon; depose Everett Webb	9.2
12/12/2019	RJM	Conference with Kim Guthrie regarding needed research regarding base wage rate when a bonus or on-call fee is paid; consideration of calculation of damages for class members; review of payroll documents and employer information; email correspondence to Defendants' counsel regarding same	1.4

12/13/2019	RJM	Attention to payroll records and preparation of spreadsheet to calculate damages for all CSRs	4
12/17/2019	RJM	Conference with Kim Guthrie regarding estimating damages and regular rate	0.3
12/20/2019	RJM	Email correspondence with all Plaintiffs' counsel regarding depositions of Everett Webb and Dan Bunting	0.2
12/24/2019	RJM	Review of Defendants' corporate representative's deposition for reference to statements regarding entity spreadsheet exhibit and on-call policies for each entity	0.5
12/28/2019	RJM	Attention to payroll records and preparation of spreadsheet to calculate damages for all CSRs	4
12/30/2019	RJM	Attention to payroll records and preparation of spreadsheet to calculate damages for all CSRs; attention to upcoming deadlines and case progress	1.8
12/31/2019	RJM	Attention to suggestions in support of Plaintiffs' Motion for Conditional Class Certification; email correspondence with all Plaintiffs' counsel regarding same	1.8
1/2/2020	RJM	Make additional revisions to suggestions in support of Plaintiffs' Motion for Conditional Class Certification; email correspondence with all Plaintiffs' counsel regarding same; review of proposed class notice	2.1
1/3/2020	RJM	Review of proposed class notice; continued attention to and revisions of suggestions in support of Motion for Conditional Class Certification; email correspondence with all Plaintiffs' counsel regarding same; telecon with all Plaintiffs' counsel regarding same; attention to scheduling order and deadlines and determine whether additional time is needed	4.2
1/4/2020	RJM	Prepare attorneys' declaration for filing with Motion for Conditional Class Certification	1
1/5/2020	RJM	Review of payroll records and preparation of spreadsheet to calculate damages for all CSRs	5.8
1/6/2020	RJM	Attention to finalizing suggestions in support of Motion for Conditional Class Certification and class notice; email correspondence and telecon with all Plaintiffs' counsel regarding same; review protective order and Defendants' discovery responses regarding manner to attach exhibits to Motion	2.1
1/7/2020	RJM	Conference with all Plaintiffs' counsel regarding upcoming litigation costs, notices, and experts and estimation of damages based on payroll records review thus far	0.5

1/15/2020	RJM	Review proposed correspondence to Defendants' counsel regarding corporate representative deposition; email correspondence with all Plaintiffs' counsel regarding same	0.3
1/17/2020	RJM	Email correspondence with Frank Neuner regarding mediation and status; email correspondence with all Plaintiffs' counsel regarding same	0.3
1/28/2020	RJM	Email correspondence with all Plaintiffs' counsel regarding discovery deadlines and strategy to move case forward	0.4
1/30/2020	RJM	Email correspondence with all Plaintiffs' counsel regarding telecon with Defendants' counsel and potential settlement value of case	0.6
1/31/2020	RJM	Telecon with all Plaintiffs' counsel regarding settlement analysis and upcoming telecon with Defendants' counsel; telecon with Lori Hopkins regarding status; telecon with Kila Hagler regarding status	1.8
2/1/2020	RJM	Attention to payroll records and preparation of spreadsheet to calculate damages for all CSRs;	6.3
2/3/2020	RJM	Attention to payroll records and preparation of spreadsheet to calculate damages for all CSRs; email correspondence with all Plaintiffs' counsel; attention to letter from Defendants' counsel; telecon with Matt Clement regarding Defendants' request for extension; review of additional payroll records produced	1.7
2/4/2020	RJM	Research with regard to statute of limitations for collective actions versus class actions and tolling; research with regard to attorney-client privilege as it applies to business decisions made by general counsel; telecon with Matt clement regarding potential settlement and tolling; email correspondence with Defendants' counsel regarding discovery and depositions; review of deposition testimony regarding Defendants' counsel's correspondence	3.8
2/5/2020	RJM	Review additional payroll records to ensure no additional class members exist	0.5
2/7/2020	RJM	Review of settlement offer from Defendants; review and analyze locations listed in settlement proposal as compared to our payroll damage analysis; telecon with all Plaintiffs' counsel regarding potential counter offer; email correspondence with all Plaintiffs' counsel regarding discrepancy regarding locations	2.5

2/10/2020	RJM	Conference with Kim Guthrie regarding settlement offer and attention to making outline of considerations for telecon with all Plaintiffs' counsel; telecon with all Plaintiffs' counsel regarding settlement offer; attention to making counter-settlement offer; review deposition and discovery documents regarding average hours of CSRs worked while on-call	2.8
2/12/2020	RJM	Attention to Defendants' response to settlement counter-offer and telecon with all Plaintiffs' counsel regarding same; review of payroll documents and discovery documents to determine locations with improper pay and CSR on-call policies; email correspondence with Defendants' counsel regarding discrepancies in records and list provided with settlement offer	4
2/13/2020	RJM	Email correspondence with all Plaintiffs' counsel regarding settlement offer; email correspondence with Kila Hagler and Lori Hopkins regarding settlement offer; telecon with Kila Hagler regarding settlement offer	0.7
2/14/2020	RJM	Attention to settlement proposal and locations for on-call employees; email correspondence with all Plaintiffs' counsel regarding settlement proposal	1
2/17/2020	RJM	Email correspondence with all Plaintiffs' counsel regarding settlement; telecon with all Plaintiffs' counsel regarding settlement	0.9
2/19/2020	RJM	Email correspondence with Defendants' counsel regarding extension of time for response to Motion for Conditional Class Certification; review proposed consent motion and order	0.6
2/24/2020	RJM	Email correspondence with all Plaintiffs' counsel regarding settlement negotiations; research regarding award of multipliers in FLSA actions; attention to fees billed in case	2.9
2/25/2020	RJM	Attention to attorney's fee analysis; review of attorney fee motions filed in other matters; email correspondence with all Plaintiffs' counsel regarding settlement	1.2
2/27/2020	RJM	Review of Court Order and scheduling of settlement deadlines	0.2
3/9/2020	RJM	Email correspondence with all Plaintiffs' counsel regarding attorney's fee motion	0.3
3/16/2020	RJM	Attention to fees billed in case and Motion for Attorney's Fees	0.4
3/30/2020	RJM	Edit and revise billing entries for inclusion in Motion for Attorneys' Fees	1.3
4/6/2020	RJM	Attention to release agreement; attention to affidavits in support of fee motion	0.4

4/7/2020	RJM	Review proposed settlement agreement; review of location list; preparation of notes regarding same in preparation for tomorrow's phone conference	1.5
4/8/2020	RJM	Preparation of redline edits and comments to proposed settlement agreement; telephone conference with co-counsel regarding revisions to proposed settlement agreement; telephone conference with Kim Guthrie regarding draft of proposed order	2.3
4/10/2020	RJM	Preparation of Proposed Settlement Order; review of proposed Notice to Class; email correspondence regarding settlement of this matter and finalizing settlement documents	3.3
4/13/2020	RJM	Review and revise proposed Order; review and revise proposed Notice; review of motion for extension	0.5
4/14/2020	RJM	Review of revised notice and order; email correspondence regarding finalizing same	0.5
4/24/2020	RJM	Attention to settlement finalization; review of redline from Anne Baggott; telephone conference with co-counsel regarding potential changes; begin preparation of new motion for class certification	2.5
4/27/2020	RJM	Preparation of Motion for Class Certification, Memorandum in Support and Revised Order Approving Settlement	3.5
4/28/2020	RJM	Preparation of Joint Motion to Approve FLSA Collective Settlement; review of email correspondence regarding settlement of attorneys' fee matter; attention to redline changes to settlement agreement from defense counsel	4.5
4/29/2020	RJM	Attention to finalizing and editing settlement documents and pleadings; preparation of declaration in support of fee motion	5
4/30/2020	RJM	Revise declaration in support of fee motion; email discussion regarding finalizing fee motion and request for fees; finalize settlement documents; attention to client signatures on settlement agreement and explanation of settlement agreement	2.5
5/1/2020	RJM	Finalize for filing settlement documents and fee motion	1.5
		TOTAL	202

Date	Attorney	Description	Hours
1/18/2019	KJZG	Legal research regarding whether employees of AeroCare should be paid for all on-call time or only that time when they are actually taking calls	1
1/19/2019	KJZG	Legal research regarding whether employees of AeroCare should be paid for all on-call time or only that time when they are actually taking calls; begin preparing legal memorandum regarding same	2.5
1/21/2019	KJZG	Legal research regarding state law claims to bring for failure to pay overtime wages; prepare legal memorandum regarding same; continue legal research regarding whether employees of AeroCare should be paid for all on-call time or only that time when they are actually taking calls; continue preparing legal memorandum regarding same; legal research regarding whether AeroCare should receive credit toward unpaid wages for flat fee paid to employees to be on-call; prepare legal memorandum regarding same	6
1/22/2018	KJZG	Continue legal research regarding state law claims to bring for failure to pay overtime wages; continue preparing legal memorandum regarding same	2
1/23/2019	KJZG	Conference with Ryan McDaniels regarding research on FLSA issues in preparation for filing complaint	0.3
2/15/2019	KJZG	Telecon with all Plaintiffs' counsel regarding draft Complaint and issues regarding same including named Plaintiff, venue, and confirmation of facts	0.4
3/8/2019	KJZG	Revise Complaint to have only one named Plaintiff and add additional facts	0.8
3/11/2019	KJZG	Review Complaint and make additional revisions to Complaint	0.5
3/13/2019	KJZG	Telecon with all Plaintiffs' counsel regarding Complaint	0.3
3/18/2019	KJZG	Attention to judge assignment and consideration whether to seek change of judge	0.2
4/2/2019	KJZG	Email correspondence with all Plaintiffs' counsel and Defendants' counsel regarding extension of time for AeroCare to file responsive pleading	0.3
4/17/2019	KJZG	Attention to Defendants' filings this date and entry of Court Orders; review Motion to Dismiss filed by Defendants	0.6
4/17/2019	KJZG	Attention to Defendants' filings this date and entry of Court Orders; review Motion to Dismiss filed by Defendants; email correspondence with all Plaintiffs' counsel regarding response to Motion to Dismiss	0.8

4/23/2019	KJZG	Prepare suggestions in opposition to Defendants' Motion to Dismiss; legal research to prepare same; attention to joint scheduling order	2.7
4/24/2019	KJZG	Rule 26(f) telephone conference with all Plaintiffs' counsel and Defendants' counsel	0.7
4/30/2019	KJZG	Revise suggestions in opposition to Defendants' Motion to Dismiss; email correspondence with all Plaintiffs' counsel	0.7
5/3/2019	KJZG	Telephone hearing with Court regarding scheduling order	0.2
5/13/2019	KJZG	Attention to Defendants' Rule 26 disclosures; attention to discovery requests to Defendants and to drafting same	1
6/14/2019	KJZG	Attention to discovery requests to Defendants and revisions to same; attention to discovery requests sent from Defendants; email correspondence with all Plaintiffs' counsel regarding same	1.1
6/17/2019	KJZG	Prepare mediation statement; email correspondence with Lori Hopkins regarding responding to discovery; telecon with all Plaintiffs' counsel regarding discovery and mediation statement; revise and finalize discovery to all Defendants	2.6
6/20/2019	KJZG	Attention to responses to discovery sent from Defendants; extended telecon with Lori Hopkins regarding upcoming mediation and discovery responses	2
6/25/2019	KJZG	Prepare answers to Defendants' interrogatories; attend mediation	5.8
6/27/2019	KJZG	Prepare objections and answers to Defendants' interrogatories and requests for production of documents	1.4
7/1/2019	KJZG	Prepare objections and answers to Defendants' interrogatories and requests for production of documents	1.4
7/2/2019	KJZG	Telecon with Lori Hopkins regarding discovery responses; revise discovery responses to Defendants; attention to email correspondence from Lori Hopkins regarding social media posts	0.5
7/3/2019	KJZG	Prepare objections, answers, and responses to Defendants' discovery requests; email correspondence with all Plaintiffs' counsel regarding same	0.8
7/5/2019	KJZG	Continue preparing discovery objections and responses; email correspondence with all Plaintiffs' counsel; email correspondence with Lori Hopkins	1.1
7/8/2019	KJZG	Email correspondence with all Plaintiffs' counsel; finalize discovery objections and responses	0.4

7/18/2019	KJZG	Email correspondence with Kila Hagler; attention to additional Rule 26 disclosure documents sent from Defendants this date	0.5
7/19/2019	KJZG	Email correspondence with all Plaintiffs' counsel regarding status of discovery and adding an additional party and potentially adding Missouri state law claims	0.2
8/1/2019	KJZG	Email correspondence with Lori Hopkins	0.2
8/6/2019	KJZG	Attention to email correspondence from Court regarding post-mediation statement; prepare post-mediation statement; email correspondence with all counsel and mediator; telecon with Defendants' counsel's office	1
8/26/2019	KJZG	Attention to email correspondence from Defendants' counsel; review and revise proposed protective order	0.9
8/28/2019	KJZG	Further attention and revision to proposed protective order	0.3
9/5/2019	KJZG	Conference with all Plaintiffs' counsel regarding strategy and status; email correspondence with client regarding deposition	0.8
9/9/2019	KJZG	Conference with Ryan McDaniels regarding discovery review and Rule 26 supplementation	0.3
10/21/2019	KJZG	Email correspondence with all Plaintiffs' counsel regarding deposition notice of Defendants' corporate representative; attention to corporate representative deposition notices; attention to Federal Rules regarding depositions, time limit, and number that can be taken	1.3
10/22/2019	KJZG	Attention to Defendants' discovery responses, Ryan McDaniels' memorandum regarding same, and protective order; email correspondence with all Plaintiffs' counsel regarding same; email correspondence with Kila Hagler to get information for additional Rule 26 disclosures and deposition dates; email correspondence with Defendants' counsel regarding depositions of Defendants' corporate representatives and Plaintiffs' depositions; email correspondence with Lori Hopkins regarding deposition dates	1.6
10/24/2019	KJZG	Phone message to Kila Hagler regarding scheduling deposition; email to Lori Hopkins regarding deposition; email correspondence with all Plaintiffs' counsel regarding Plaintiffs' depositions	0.5
10/26/2019	KJZG	Email correspondence with Kila Hagler regarding deposition and Rule 26 disclosures	0.3

10/28/2019	KJZG	Attention to Defendants' discovery responses and Plaintiffs' discovery responses to prepare Lori Hopkins for her deposition; conference with Lori Hopkins and Karie Schulte to prepare Lori Hopkins for deposition; email correspondence with all Plaintiffs' counsel regarding Plaintiffs' depositions; attention to Court's docket entry regarding protective order; email correspondence with Kila Hagler throughout day regarding depositions; email correspondence with Lori Hopkins	3.1
10/30/2019	KJZG	Email correspondence with Kila Hagler	0.4
10/31/2019	KJZG	Attention to documents sent from client	0.2
11/1/2019	KJZG	Attention to scheduling depositions of Plaintiffs and Defendants' corporate representatives; email correspondence with Lori Hopkins; email correspondence with all Plaintiffs' counsel and Defendants' counsel; telecon with Kila Hagler regarding Rule 26 disclosures; telecon with all Plaintiffs' counsel regarding depositions and Rule 26 disclosures; prepare Kila Hagler's Rule 26 disclosures	2.4
11/4/2019	KJZG	Email correspondence with Kila Hagler and all Plaintiffs' counsel regarding deposition preparation	0.2
11/5/2019	KJZG	Email correspondence with all Plaintiffs' counsel regarding Plaintiffs' depositions	0.3
11/7/2019	KJZG	Email correspondence with all Plaintiffs' counsel regarding Plaintiffs' depositions	0.4
11/11/2019	KJZG	Email correspondence with Kila Hagler regarding deposition preparation; email correspondence with all Plaintiffs' counsel regarding Rule 26 disclosures for Kila Hagler; attention to Kila Hagler's Rule 26 disclosures	0.4
11/12/2019	KJZG	Revise Kila Hagler's Rule 26 disclosures; email correspondence with all Plaintiffs' counsel regarding same	0.7
11/13/2019	KJZG	Conference with Ryan McDaniels regarding strategy for Defendants' corporate representative depositions; email correspondence with all Plaintiffs' counsel regarding same throughout day; attention to Defendants' objections to corporate representative deposition notices and topics	1.2

11/14/2019	KJZG	Email correspondence with all Plaintiffs' counsel and Defendants' counsel regarding Plaintiffs' depositions; continue preparing Kila Hagler's Rule 26 disclosures; prepare Lori Hopkins' supplemental discovery responses; attention to research regarding corporate representative depositions	2
11/15/2019	KJZG	Finalize Kila Hagler's Rule 26 disclosures; email correspondence with all Plaintiffs' counsel; conference with Kila Hagler regarding deposition preparation; prepare for Lori Hopkins' and Kila Hagler's depositions	2.9
11/18/2019	KJZG	Attention to Defendants' discovery sent to Kila Hagler; attend depositions of Kila Hagler and Lori Hopkins; conference with Ryan McDaniels regarding Kila Hagler and Lori Hopkins' depositions	4.6
11/19/2019	KJZG	Telecon with all Plaintiffs' counsel regarding litigation strategy, discovery, and depositions; attention to subpoena to Everette Webb; attention to letter sent from Defendants' counsel regarding objections to corporate representative deposition notice	0.5
11/20/2019	KJZG	Attention to Defendants' objections to corporate representative deposition and our response to same; email correspondence with all Plaintiffs' counsel regarding deposition of Everette Webb	1
11/21/2019	KJZG	Attention to discovery requests sent from Defendants; email correspondence with Kila Hagler regarding same; attention to Defendants' summary to Court regarding discovery dispute; attention to additional payroll records sent from Defendants	1.9
11/22/2019	KJZG	Email correspondence with all Plaintiffs' counsel regarding discovery dispute	0.3
11/25/2019	KJZG	Attention to Defendants' discovery responses; telecon with all Plaintiffs' counsel regarding corporate representative depositions	0.8
11/27/2019	KJZG	Conference with Ryan McDaniels regarding corporate representative deposition, strategy, and litigation steps	1.1
12/2/2019	KJZG	Attention to deposition transcripts of Kila Hagler and Lori Hopkins	0.4
12/10/2019	KJZG	Conference with Ryan McDaniels regarding deposition of Everette Webb; legal research regarding attorney-client privilege in relation to Everette Webb and Defendants' counsel	1.5
12/12/2019	KJZG	Conference with Ryan McDaniels regarding needed research regarding regular rate when a bonus or on-call fee is paid; email correspondence with Kila Hagler; prepare Kila Hagler's objections and responses to discovery	2.7

12/13/2019	KJZG	Continue preparing Kila Hagler's objections and responses to Defendants' discovery requests; telecon with Kila Hagler; prepare Kila Hagler's and Lori Hopkins' objections to Defendants' second discovery requests; legal research regarding regular rate when a bonus or on-call fee is paid for purposes of calculating damages	3.2
12/14/2019	KJZG	Continue preparing Kila Hagler's responses to Defendants' second discovery requests; legal research regarding regular rate when a bonus or on-call fee is paid	2.7
12/16/2019	KJZG	Finalize Kila Hagler and Lori Hopkins' discovery responses	1
12/17/2019	KJZG	Finalize Lori Hopkins' supplemental discovery responses; conference with Ryan McDaniels regarding estimating damages and regular rate; additional legal research regarding regular rate	0.9
12/23/2019	KJZG	Telecon with Lori Hopkins regarding case update	0.2
12/28/2019	KJZG	Attention to documents recently produced by Defendants	1
12/31/2019	KJZG	Attention to suggestions in support of Plaintiffs' Motion for Conditional Class Certification	0.8
1/2/2020	KJZG	Make additional revisions to suggestions in support of Plaintiffs' Motion for Conditional Class Certification and legal research for same; email correspondence with all Plaintiffs' counsel regarding same	4.8
1/3/2020	KJZG	Review of proposed class notice; continued attention to and revisions of suggestions in support of Motion for Conditional Class Certification; email correspondence with all Plaintiffs' counsel regarding same; telecon with all Plaintiffs' counsel regarding same	2.8
1/4/2020	KJZG	Continued attention and revisions to suggestions in support of Motion for Conditional Class Certification; prepare table of contents and table of authorities for same	1.5
1/6/2020	KJZG	Attention to finalizing suggestions in support of Motion for Conditional Class Certification and class notice; email correspondence and telecon with all Plaintiffs' counsel regarding same	1.2
1/27/2020	KJZG	Email correspondence with Kila Hagler regarding status; email correspondence with Lori Hopkins regarding status; email correspondence with all Plaintiffs' counsel	0.5

1/31/2020	KJZG	Attention to payroll records and preparation of spreadsheet to calculate damages for all CSRs; telecon with all Plaintiffs' counsel regarding settlement analysis and upcoming telecon with Defendants' counsel; telecon with Lori Hopkins regarding status; telecon with Kila Hagler regarding status	4.8
2/1/2020	KJZG	Attention to payroll records and preparation of spreadsheet to calculate damages for all CSRs	4.4
2/2/2020	KJZG	Attention to payroll records and preparation of spreadsheet to calculate damages for all CSRs;	5
2/3/2020	KJZG	Attention to payroll records and preparation of spreadsheet to calculate damages for all CSRs; attention to list of corporate entities with improper pay policies and whether we have payroll records showing on-call time for employees of those entities; email correspondence with all Plaintiffs' counsel; attention to letter from Defendants' counsel	3.8
2/4/2020	KJZG	Email correspondence with all Plaintiffs' counsel regarding potential settlement; email correspondence with Defendants' counsel regarding discovery and depositions	0.5
2/10/2020	KJZG	Conference with Ryan McDaniels regarding settlement offer and attention to making outline of considerations for telecon with all Plaintiffs' counsel; telecon with all Plaintiffs' counsel regarding settlement offer; attention to making counter-settlement offer	1.7
2/11/2020	KJZG	Email correspondence with all Plaintiffs' counsel regarding settlement	0.3
2/12/2020	KJZG	Attention to Defendants' response to settlement counter-offer and telecon with all Plaintiffs' counsel regarding same	0.5
2/15/2020	KJZG	Email correspondence with all Plaintiffs' counsel regarding settlement	0.4
2/16/2020	KJZG	Email correspondence with all Plaintiffs' counsel regarding settlement	0.5
2/19/2020	KJZG	Email correspondence with all Plaintiffs' counsel regarding settlement and Defendants' request for additional time regarding response to Motion for Conditional Class Certification	0.3
2/21/2020	KJZG	Attention to settlement discussions and email correspondence with all Plaintiffs' counsel regarding same; legal research regarding Court's authority to review settled attorneys' fee award	0.9

2/24/2020	KJZG	Email correspondence with Defendants' counsel regarding settlement of attorneys' fees; attention to fees billed in case; telecon with all Plaintiffs' counsel regarding attorneys' fees	1.1
2/25/2020	KJZG	Attention to settlement regarding attorneys' fees issues	0.3
3/27/2020	KJZG	Edit and revise billing entries regarding spelling and syntax for inclusion in Motion for Attorneys' Fees	2.2
3/28/2020	KJZG	Edit and revise billing entries regarding spelling and syntax for inclusion in Motion for Attorneys' Fees	3
3/29/2020	KJZG	Edit and revise billing entries regarding spelling and syntax for inclusion in Motion for Attorneys' Fees	2.3
4/3/2020	KJZG	Email correspondence with all Plaintiffs' counsel regarding class notice and attention to wording of same; email correspondence with all Plaintiffs' counsel and Defendants' counsel regarding Defendants' request for extension of time	0.5
4/6/2020	KJZG	Attention to Motion for Attorneys' Fees issues; attention to settlement issues and Defendants' request for additional time to file settlement agreement; telecon with Matt Clement regarding same	0.8
4/7/2020	KJZG	Email correspondence with all Plaintiff's counsel; attention to draft settlement agreement and proposed revisions to same	2.5
4/8/2020	KJZG	Review list of locations using on-call from Defendants attached to settlement agreement and cross-reference with master spreadsheet to check whether on-call shifts were weekly or daily; extended telecon with all Plaintiffs' counsel regarding draft settlement agreement	2.5
4/10/2020	KJZG	Review draft of class notice; review draft of proposed	1.2
4/13/2020	KJZG	Attention to revisions to proposed class notice; email correspondence with all Plaintiff's counsel regarding same; attention to Defendants' motion for extension of time	1.7
4/14/2020	KJZG	Review draft notice and order for sending to Defendants; attention to Court's Order regarding extension of time	0.8
4/24/2020	KJZG	Email correspondence with all Plaintiffs' counsel regarding settlement documents; attention to Defendants' revisions to settlement documents; telecon with all Plaintiffs' counsel regarding settlement documents	1.6
4/27/2020	KJZG	Email correspondence with all Plaintiffs' counsel regarding class notice and Defendants' refusal to attach list of affected locations	0.4

4/28/2020	KJZG	Review unopposed motion for class certification and memorandum in support and prepare suggestions for revisions to same; email correspondence with all Plaintiffs' counsel regarding motion for attorney's fees and other settlement issues; email correspondence with Defendants' counsel regarding settlement issues; review joint motion for approval of settlement and prepare revisions to same	1.5
4/29/2020	KJZG	Review joint motion for approval of settlement and prepare revisions to same; review motion for attorney's fees and prepare revisions to same; review Defendants' additional proposed changes to settlement agreement and class notice; telecon with all Plaintiffs' counsel regarding settlement issues; email correspondence with all Plaintiffs' counsel throughout day regarding same; email correspondence with Defendants' counsel regarding settlement issues	3.1
4/30/2020	KJZG	Email correspondence with all Plaintiffs' counsel regarding settlement issues and motion for attorney's fees, suggestions in support and attachments throughout day; review new draft of in support of motion for attorney's fees; telecon with Kila Hagler regarding settlement; telecon with Lori Hopkins regarding settlement	3
5/1/2020	KJZG	Finalize settlement documents for filing; email correspondence with all counsel throughout day regarding same	1
		TOTAL	148.2

Date	Attorney	Description	Hours
10/12/2018	JTB	Legal research regarding Missouri law on jurisdiction, proper venue for case, and FLSA	3.2
		TOTAL	3.2